

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN, Inc., et al.,

Post-Effective Date Debtors.<sup>1</sup>

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**RE: D.I. 1838**

**CERTIFICATION OF COUNSEL REGARDING GUC TRUST’S SECOND OMNIBUS  
(NON-SUBSTANTIVE) OBJECTION TO CERTAIN CLAIMS (AMENDED CLAIMS)**

The undersigned counsel for the JOANN Liquidating Trust (the “GUC Trust”) in the above-captioned cases hereby certifies that:

1. On November 11, 2025, the GUC Trust, by and through Steven Balasiano, solely in his capacity as the trustee of the GUC Trust, filed the *GUC Trust’s Second Omnibus (Non-substantive) Objection to Certain Claims (Amended Claims)* [D.I. 1838] (the “Objection”), by which the GUC Trust sought entry of the proposed order attached thereto (the “Proposed Order”) disallowing and expunging certain claims which were later amended and superseded by another claim filed by the identical claimant relating to the same subject matter.

2. Pursuant to the *Notice of GUC Trust’s Second Omnibus (Non-substantive) Objection to Certain Claims (Amended Claims)* [D.I. 1838-3], responses to the Objection were required to have been filed with the Court and served no later than December 3, 2025, at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

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<sup>1</sup> The Post-Effective Date Debtors in these chapter 11 cases are: JOANN Inc.; Needle Holdings LLC; Jo-Ann Stores, LLC; Creative Tech Solutions LLC; Creativebug, LLC; WeaveUp, Inc.; JAS Aviation, LLC; joann.com, LLC; JOANN Ditto Holdings Inc.; Dittopatterns LLC; JOANN Holdings 1, LLC; JOANN Holdings 2, LLC; and Jo-Ann Stores Support Center, Inc.

3. Prior to the Objection Deadline, the GUC Trust received informal comments to the Proposed Order (the “Response”) from counsel to claimant FacilitySource LLC dba CBRE Retail & Multi--Site.

4. The GUC Trust has revised the Proposed Order (the “Revised Proposed Order”) to resolve the Response. The Revised Proposed Order is attached hereto as **Exhibit 1**.

5. The resolution reflected in the Revised Proposed Order has been shared with counsel for the party that submitted the Response, and such party has confirmed its agreement to that resolution. For the convenience of the Court and all parties in interest, a redline of the Revised Proposed Order, showing changes made from the Proposed Order, is attached hereto as **Exhibit 2**.

*[Remainder of page intentionally blank]*

WHEREFORE, the GUC Trust respectfully request that the Revised Proposed Order be entered at the earliest convenience of the Court.

Dated: December 11, 2025

**BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP**

/s/ Steven L. Walsh

Jennifer R. Hoover (No. 5111)  
Steven L. Walsh (No. 6499)  
1313 N. Market Street, Suite 1201  
Wilmington, DE 19801  
Telephone: (302) 442-7010  
Facsimile: (302) 442-7012  
Email: jhoover@beneschlaw.com  
swalsh@beneschlaw.com

-and-

**KELLEY DRYE & WARREN LLP**

Eric R. Wilson (*pro hac vice*)  
Maeghan J. McLoughlin (*pro hac vice*)  
Charles J. Fendrych (*pro hac vice*)  
3 World Trade Center  
175 Greenwich Street  
New York, New York 10007  
Tel: (212) 808-7800  
Fax: (212) 808-7897  
Email: ewilson@kelleydrye.com  
mmcloughlin@kelleydrye.com  
cfendrych@kelleydrye.com

*Counsel to the GUC Trust*